

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION**

York County,

Plaintiff,

vs.

Appaloosa Management, LP; DT Sports
Holding, LLC; Tepper Sports Holding, Inc.;
and the City of Rock Hill,

Defendants.

C/A#: 0:22-cv-02167-CMC

**PLAINTIFF YORK COUNTY'S
ANSWERS TO LOCAL RULE 26.01
INTERROGATORIES**

Plaintiff York County answers Local Civil Rule 26.01 Interrogatories as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER:

Plaintiff is not aware of any persons or legal entities who may have a subrogation interest in Plaintiff's claims.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

Plaintiff has demanded a jury trial on all claims.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER:

Plaintiff is a body politic and not a publicly-owned company. Plaintiff does not have any parent corporations or other publicly-held corporations owning ten percent or more of its

stock. Plaintiff is not a parent of any publicly owned company and does not own ten percent of any publicly-owned company.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

ANSWER:

Plaintiff filed this action in the Court of Common Pleas for York County, South Carolina in the Sixteenth Judicial Circuit. Plaintiff has filed a Motion to Remand causes of action 1-4 and will file a Motion to Remand cause of action 5 to state court because, among other reasons, federal subject matter jurisdiction does not exist.

- (E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

The underlying State Court Complaint includes five causes of action. On July 7, 2022, the Corporate Defendants removed causes of action 1 through 4 to this Court and were supplied case number 22-cv-02167-CMC. On July 22, 2022, the City of Rock Hill separately removed cause of action number 5 and was supplied case number 22-cv-02380-CMC. The Court has established a related briefing schedule concerning subject matter jurisdiction. Plaintiff has moved to remand Causes of Action 1- 4 to state court and will, likewise, seek remand of Cause of Action 5.

[Signature to Follow]

s/ Jordan M. Crapps

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